

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**UNITED STATES OF AMERICA )  
v. )      Criminal No. 11-186-S-DLM  
                )  
JOSEPH CARAMADRE )  
                )  
and              )  
RAYMOUR RADHAKRISHNAN )  
                )  
Defendants.      )**

**GOVERNMENT'S ASSENTED TO MOTION  
TO UNSEAL RELATED MISCELLANEOUS MATTER**

The United States of America, by and through its undersigned attorneys, hereby moves the Court unseal the matter of *In re Grand Jury Proceedings, Misc. No. 09-84S* (hereinafter "the miscellaneous matter"), which is a sealed matter related to the above captioned prosecution of *United States v. Joseph Caramadre and Raymour Radhakrishnan*, Cr. No. 186S (hereinafter "the criminal case").<sup>1</sup> The government has conferred with past and present counsel for the defendants and they have no objection to the granting of this motion.

As the Court is aware, the miscellaneous matter was initiated by the government in September 2009 for the purpose of obtaining Court approval to take Rule 15 depositions of certain terminally ill

---

<sup>1</sup>Although the matter was styled "*In re: Grand Jury Proceedings*," at the time the matter was initiated no evidence had been presented to the grand jury. Consistent with representations made to the Court by the government, the depositions were never presented to the grand jury.

individuals in order to preserve their testimony for trial in the criminal case (assuming there would be one). Pursuant to an Opinion and Order dated September 22, 2009, the Court granted the government's request to take the depositions but reserved for trial issues with respect to their admissibility and Motions to Suppress.

In order to litigate the Motions to Suppress in the context of the criminal case, the parties need to reference and cite to the miscellaneous matter, including arguments and representations made to the Court and the transcripts of the depositions. (The medical records of the proposed deponents should remain sealed to protect their privacy.)

For the reasons set forth herein, we respectfully request the matter be unsealed.

Respectfully submitted,

PETER F. NERONHA  
UNITED STATES ATTORNEY

/s/ John P. McAdams  
JOHN P. McADAMS  
Assistant U. S. Attorney

LEE H. VILKER  
Assistant U.S. Attorney  
U.S. Attorney's Office  
50 Kennedy Plaza, 8th Floor  
Providence, RI 02903

**CERTIFICATE OF SERVICE**

I, hereby certify that on this 16th day of March, 2012, I caused the within Government's Assented to Unseal Related Miscellaneous Matter to be served via the Court's Electronic Filing System on:

**For Joseph Caramadre:**

Michael J. Lepizzera, Esq.  
James T. McCormack, Esq.

**For Raymour Radhakrishnan:**

Olin Thompson, Esq.

**Former Counsel via regular e-mail only:**

Robert G. Flanders Jr., Esq.

Jeffrey B. Pine, Esq.

/s/John P. McAdams  
John P. McAdams  
Assistant U.S. Attorney  
United States Attorney's Office  
50 Kennedy Plaza, 8<sup>th</sup> Floor  
Providence, RI 02903  
John.p.mcadams@usdoj.gov